

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

In re: Methyl Tertiary Butyl Ether ("MTBE") Products  
Liability Litigation

---

**MDL No. 1358  
Master File C.A. No.  
1:00-1898 (SAS)**

**This document relates to the following case:**

*Commonwealth of Pennsylvania v.  
Exxon Mobil Corp. et al.*  
Case No. 1:14-cv-06228

---

PLEASE TAKE NOTICE that under Local Civil Rule 6.3 of the United States District Court for the Southern District of New York, LUKOIL Americas Corporation ("LAC") hereby moves for reconsideration of this Court's Order And Opinion #106384 (ECF No. 279), entered April 5, 2016, and for such other and further relief as the Court determines to be just and proper.

Respectfully submitted,

Katherine M. Katchen  
AKIN GUMP STRAUSS  
HAUER & FELD LLP  
2001 Market Street  
Suite 4100  
Philadelphia, PA 19103  
Phone: 215-965-1239  
Fax: 215-965-1210  
kkatchen@akingump.com

Matthew A. Scarola  
AKIN GUMP STRAUSS  
HAUER & FELD LLP  
580 California Street  
Suite 1500  
San Francisco, CA 94104  
Phone: 415-765-9507  
Fax: 415-765-9501  
mscarola@akingump.com

/s/ James P. Tuite  
James P. Tuite  
AKIN GUMP STRAUSS  
HAUER & FELD LLP  
1333 New Hampshire Ave., NW  
Washington, D.C. 20036  
Phone: 202-887-4406  
Fax: 202-887-4288  
jtuite@akingump.com

*Attorneys for LUKOIL Americas  
Corporation*

Date: April 19, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that on April 19, 2016, a true and correct copy of this Notice of Motion was electronically served on counsel of record via LexisNexis File & Serve, along with LAC's Memorandum in Support. A hard copy of those papers will be sent to opposing counsel by overnight delivery.

/s/ James P. Tuite

Date: April 19, 2016